

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PETRÓLEOS DE VENEZUELA, S.A., PDVSA
PETRÓLEO, S.A., and PDV HOLDING, INC.,

Plaintiffs,

- against -

MUFG UNION BANK, N.A. and GLAS AMERICAS
LLC,

Defendants.


Case No: 19-cv-10023-KPF

**DECLARATION OF ALLAN R. BREWER-CARÍAS IN SUPPORT
OF PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

I, ALLAN R. BREWER-CARÍAS, hereby declare pursuant to 28 U.S.C. § 1746 and
Local Rule 7.1 as follows:

1. Attached hereto as Exhibit A is a true and correct copy of the Expert Report of
Allan R. Brewer-Carías dated March 16, 2020.
2. Attached hereto as Exhibit B is a true and correct copy of the Expert Report of
Allan R. Brewer-Carías Rebutting the Report of [REDACTED] dated May 1, 2020.
3. I authored the attached reports as a witness retained to provide expert testimony in
this case and hereby adopt them as my testimony under penalty of perjury. If called to testify at
trial, I would testify under oath as set forth therein.
4. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 9th day of June, 2020


Allan R. Brewer-Carías